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May 21, 2018

Hon. Catherine C. Blake
United States District Court for the
District of Maryland
101 W Lombard Street
Baltimore, Maryland 21201

Re: United States v. Montana Barronette
Criminal No: CCB-16-0597

Dear Judge Blake:

I write to follow-up with a matter raised during the recent Motions hearing with regards to Mr. Barronette's detention at the Northern Neck Regional Jail (NNRJ).

As you are aware, Mr. Barronette is charged in a superseding indictment with Conspiracy to Commit Racketeering Acts, in violation of 18 U.S.C. § 1962(d); Violent Crimes in Aid of Racketeering, in violation of 18 U.S.C. § 1959(a)(1); and Conspiracy to Distribute Controlled Substances, in violation of 21 U.S.C. § 846. On April 3, 2018, ten months after filing the Superseding Indictment, Government counsel advised the undersigned via e-mail that the United States Attorney General had directed the Capital Case Section ("CCS") of the Department of Justice to hear mitigation presentations from all defendants charged in this case with violent crimes in aid of racketeering, before a decision is made on whether to authorize local prosecutors to seek the death penalty. Mitigation presentations at CCS are currently scheduled for June 11, 2018.

Recently, the government provided additional discovery materials setting out allegations that Mr. Barronette may be involved in 4-5 previously uncharged murders.

Mr. Barronette has been detained since coming into federal custody. For a brief period of time he was held at the Chesapeake Detention Facility. For well over one year, he has been at the Northern Neck Regional Jail in Warsaw, Virginia. Travel for undersigned counsel to meet with Mr. Barronette entails travel of up to 6-7 hours, round trip. The discovery materials in this case are voluminous and review of said materials with our client is necessary, yet time consuming and exhaustive for client and attorney.

Besides the above referenced travel problems related to the access counsel has with Mr. Barronette, it is imperative that, in light of the serious charges lodged against Mr. Barronette, both

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attorneys and client have time to thoroughly review the discovery, investigate the factual underpinnings of the charges and plan accordingly. Under the current detention arrangements, it is difficult for counsel to provide effective representation. It is noted that Mr. Barronette is the only defendant who is not housed at CDF or in close proximity to Baltimore.

Undersigned counsel respectfully request that the Court consult with the United States Marshal with the goal of moving Mr. Barronette to a location more convenient for counsel.

Thank you for your continued cooperation and attention to this matter.

Very truly yours,

/s/

Alan R. L. Bussard

/s/

Michael Lawlor, Esquire
Nicholas Madiou, Esquire

ARLB:tkb

cc: Daniel Gardner Esquire Via CMECF
Christopher Romano, Esquire Via CMECF